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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORP.,

Defendant.

Case No. 5:17-CV-05671-BLF

**[PROPOSED] ORDER GRANTING VLSI  
TECHNOLOGY LLC'S LETTER BRIEF  
(Dkt. 370)**

Judge: Hon. Beth Labson Freeman

Magistrate Judge: Hon. Nathanael Cousins

1 Having considered the discovery dispute motion filed by the parties, and for the reasons  
 2 stated on the record, the Court grants the relief sought by VLSI Technology LLC in its Letter Brief  
 3 (Dkt. 370).

4 IT IS HEREBY ORDERED THAT, within 30 days:

5 1. With respect to Fox2, THAT:

- 6 a. Intel will produce all remaining binaries, models, configuration files, and any  
 7 other remaining file required to enable Fox2 to operate on VLSI's standalone  
 8 machines for the following products:

9 i. **Client products**

10 1. Alder Lake:

11 [REDACTED]

12 [REDACTED]

13 2. Broadwell Client: [REDACTED]

14 3. Cannon Lake Client: [REDACTED]

15 4. Comet Lake: [REDACTED]

16 5. Haswell Client: [REDACTED]

17 6. Ice Lake Client: [REDACTED]

18 [REDACTED]

19 7. Lakefield:

20 [REDACTED]

21 [REDACTED]

22 8. Tiger Lake Client:

23 [REDACTED]

24 [REDACTED]

25 ii. **Server products**

26 1. Broadwell server: [REDACTED]

27 2. Cascade Lake Server: [REDACTED]

28 3. Cooper Lake Server: [REDACTED]

#### 4. Haswell Server:

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## 5. Ice Lake Server:

[REDACTED]

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6. Skylake Server: 

2. Intel will produce [REDACTED], to run on VLSI's standalone machines;

3. Intel will produce the files to run [REDACTED] on VLSI's standalone machines; and

4. Intel will produce the files to run [REDACTED] on VLSI's standalone machines.

IT IS FURTHER ORDERED, THAT:

5. Intel is precluded from criticizing the accuracy of the tools that VLSI used in lieu of Intel's production to quantify and measure the benefits of each Patent;

6. Intel is precluded from criticizing VLSI's experts or witnesses with respect to testing that has been done or could have been done using Fox2 on the following products:

i. Alder Lake:

- ii. Broadwell Client; Broadwell server;
- iii. Cannon Lake Client;
- iv. Cascade Lake Server;
- v. Comet Lake;
- vi. Cooper Lake Server;
- vii. Haswell Client; Haswell Server;
- viii. Ice Lake Client; Ice Lake Server;
- ix. Lakefield Client;
- x. Tiger Lake Client;
- xi. Skylake Server.

7. Intel is precluded from referring to [REDACTED] with respect to any of the Accused Products. This includes, but is not limited to,
- a. [REDACTED]  
[REDACTED]  
[REDACTED], including features accused under the '806 and '836 Patents;
  - b. Any data that [REDACTED]  
[REDACTED], including for features accused under the '806 Patent;
  - c. Intel's reliance on any [REDACTED]  
[REDACTED], including analysis on features accused under the '014 Patent;
  - d. Reference to the [REDACTED]  
[REDACTED]  
[REDACTED] of the Accused Products.

8. Intel is precluded from criticizing VLSI's experts or witnesses on the basis that VLSI did not use an Intel-specific [REDACTED] to inform its quantification of the power benefits of the Asserted Patents, including the '806, '922, and '014 Patents; and

9. Intel is precluded from criticizing VLSI's experts or witnesses on the basis that VLSI

1 did not use an Intel-specific [REDACTED] to inform its quantification  
2 of the power benefits of the Asserted Patents, including the '207, '922 and '806 Patents.  
3

4 **IT IS SO ORDERED.**

5  
6 Date:

By: \_\_\_\_\_